

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

United States Courts
Southern District of Texas
FILED

March 04, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

CHRISTIAN LEE PATINO
RAYMOND BERRONES II
DANTE JUNIUS VELA

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CRIMINAL NO. L-25-CR- 349

DS

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about February 4, 2025, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendants,

**CHRISTIAN LEE PATINO,
RAYMOND BERRONES II, and
DANTE JUNIUS VELA,**

did knowingly conspire and agree with persons known and unknown to the grand jurors to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including but not limited to:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

to another person, in and affecting interstate and foreign commerce, knowing and having

reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), in violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b).

COUNT TWO

On or about February 4, 2025, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendant,

RAYMOND BERRONES II,

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one of the following firearms:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

and the firearm was in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT THREE

On or about February 4, 2025, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendant,

DANTE JUNIUS VELA,

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one of the following firearms:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

and the firearm was in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FOUR

On or about February 4, 2025, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendant,

DANTE JUNIUS VELA,

knowing that he had been convicted of a misdemeanor crime of domestic violence, knowingly possessed at least one of the following firearms:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

and the firearm was in affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(9) and 924(a)(8).

COUNT FIVE

On or about February 4, 2025, in the Southern District of Texas and elsewhere and within

the jurisdiction of the Court, Defendants,

**CHRISTIAN LEE PATINO,
RAYMOND BERRONES II, and
DANTE JUNIUS VELA,**

aiding and abetting each other, in connection with the acquisition of at least one of the following firearms:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

from L Buffalo Pawn, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious oral and written statement to L Buffalo Pawn, which statement was intended and likely to deceive L Buffalo Pawn, as to a fact material to the lawfulness of such acquisition of the said firearm to the Defendants under Chapter 44 of Title 18, in that **CHRISTIAN LEE PATINO** represented on a ATF Form 4473 prepared at L Buffalo Pawn that he was the actual buyer of the firearm listed on the Form 4473, when in fact as **CHRISTIAN LEE PATINO** knew he was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and Section 2.

COUNT SIX

On or about February 4, 2025, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendants,

**CHRISTIAN LEE PATINO,
RAYMOND BERRONES II, and**

DANTE JUNIUS VELA,

did fraudulently and knowingly export and send, and attempt to export and send from the United States to the United Mexican States, merchandise, articles, and objects, that is:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

contrary to the laws and regulations of the United States, to wit: Title 50, United States Code, Section 4819(a)(2) and (b) and Title 15, Code of Federal Regulations Section 730, et. seq., and did receive, conceal, buy, sell, and in any manner facilitated the transportation, concealment, and sale of said merchandise, articles, and objects, prior to exportation, knowing the same to be intended for exportation contrary to said laws and regulations of the United States, in violation of Title 18, United States Code, Sections 554 and 2.

NOTICE OF HOLDINGS SUBJECT TO FORFEITURE

18 U.S.C. § 933
(Count One)

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461 the United States gives notice to Defendants,

CHRISTIAN LEE PATINO,
RAYMOND BERRONES II, and
DANTE JUNIUS VELA,

that upon conviction of a violation of 18 U.S.C. 933, as charged in this Indictment, that upon conviction of a violation of Title 18, United States Code, Section 933 as alleged in Count One of

the Indictment all firearms and ammunition involved in said violation are subject to forfeiture, including but not limited to the following:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

**18 U.S.C. §922(g)
(Counts Two-Four)**

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendants,

**CHRISTIAN LEE PATINO,
RAYMOND BERRONES II, and
DANTE JUNIUS VELA,**

that upon conviction of a violation of Title 18, United States Code, Section 922(g), all firearms/ammunition involved in said violation are subject to forfeiture, including but not limited to the following:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

18 U.S.C. § 554
(Count Six)

Pursuant to Title 19, United States Code, Section 1595a and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendants,

CHRISTIAN LEE PATINO,
RAYMOND BERRONES II, and
DANTE JUNIUS VELA,

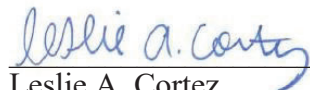
that upon conviction of a violation of Title 18, United States Code, Section 554, all merchandise attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to:

<u>FIREARMS</u>					
<u>Item</u> <u>No.</u>	<u>Manufacturer</u>	<u>Model</u>	<u>Type</u>	<u>Caliber</u>	<u>Serial</u> <u>Number</u>
1.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	FFH280599
2.	DPMS Panther Arms	A-15	Rifle	Multi-caliber	DKF400027

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY



Leslie A. Cortez
Assistant United States Attorney

USA-74-24b
(Rev. 6-1-71)

CRIMINAL DOCKET

LAREDO DIVISION

NO. **L-25-CR-349**

FILE: 2025R01583
INDICTMENT

MAG#: 25-MJ-00264
Filed: March 4, 2025

Judge: **DS**

UNITED STATES OF AMERICA

VS.

ATTORNEYS:

NICHOLAS J. GANJEL, USA
LESLIE A. CORTEZ, AUSA

**CHRISTIAN LEE PATINO,
RAYMOND BERRONES II,
DANTE JUNIUS VELA,**

CHARGES:

- Ct. 1: Trafficking of firearms
[18 USC § 933(a)]
- Cts. 2-3: Possession of Firearm and Ammunition by a person having been convicted of a
crime punishable by imprisonment for a term exceeding one year
[18 USC 922(g)(1), 924(a)(8)]
- Ct. 4: Possession of Firearm by a person having been convicted of a misdemeanor
crime of domestic violence.
[18 USC 922(g)(9), 924(a)(8)]
- Ct. 5: False statements during purchase of a firearm
[18 USC 922(a)(6), & 18 USC 2]
- Ct. 6: Smuggling Goods from the United States
[18 USC 554 & 2]

Notice of Forfeiture

TOTAL COUNTS: 6

PENALTY:

- Ct. 1: 0 to 15 years and/or \$250,000 Fine, \$100 special assessment,
Not more than a three-year term of supervised release
- Cts. 2-3: 0 to 15 years and/or \$250,000 Fine, \$100 special assessment,
Not more than a three (3)-year term of supervised release
- Ct. 4: 0 to 15 years and/or \$250,000 Fine, \$100 special assessment,
Not more than a three-year term of supervised release.
- Ct. 5: 0-10 years of imprisonment, and/or a \$250,000 fine, \$100 Special Assessment,
not more than a 3-year term of Supervised Release
- Ct. 6: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment,
Not more than a three-year term of supervised release